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18 CORY SPENCER, DIANA MILENA
19 REED, and COASTAL PROTECTION
20 RANGERS, INC.

21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

23 CORY SPENCER, an individual;
24 DIANA MILENA REED, an
25 individual; and COASTAL
26 PROTECTION RANGERS, INC., a
27 California non-profit public benefit
28 corporation,

Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)
**PLAINTIFFS' APPLICATION FOR
LEAVE TO FILE DOCUMENTS
UNDER SEAL**

Filed Concurrently with Declaration of
Samantha Wolff; Redacted Version of
Documents Proposed to be Filed Under
Seal; Unredacted Version of Documents
Proposed to be Filed Under Seal; and

1	[Proposed] Order
2	v.
3	LUNADA BAY BOYS; THE
4	INDIVIDUAL MEMBERS OF THE
5	LUNADA BAY BOYS, including but
6	not limited to SANG LEE, BRANT
7	BLAKEMAN, ALAN JOHNSTON
8	AKA JALIAN JOHNSTON,
9	MICHAEL RAE PAPAYANS,
10	ANGELO FERRARA, FRANK
11	FERRARA, CHARLIE FERRARA,
12	and N. F.; CITY OF PALOS VERDES
13	ESTATES; CHIEF OF POLICE JEFF
14	KEPLEY, in his representative
15	capacity; and DOES 1-10,
16	Defendants.

Pursuant to Local Rule 79-5, Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal Protection Rangers, Inc. ("Plaintiffs") hereby apply for leave of Court to file the following documents under seal: (1) Plaintiffs' Opposition to Defendants City of Palos Verdes Estates and Chief of Police Jeff Kepley's Motion for Summary Judgment or, In the Alternative, Summary Adjudication ("Plaintiffs' Opposition"); (2) Plaintiffs' Additional Material Facts in Opposition to Defendants City of Palos Verdes Estates and Chief of Police Jeff Kepley's Motion for Summary Judgment or, in the Alternative, Summary Adjudication ("Plaintiffs' AMF"); and (3) Declaration of Kurt Franklin in Opposition to Defendants City of Palos Verdes Estates and Chief of Police Jeff Kepley's Motion for Summary Judgment or, in the Alternative, Summary Adjudication ("Franklin Declaration"). Each of these documents reference information contained in Exhibit 21 to the Franklin Declaration, which Exhibit was also the subject of Plaintiffs' Application for Leave to File Documents Under Seal (Dkt. No. 311).

1 Exhibit 21 is a report prepared by a third-party investigator retained by the
 2 City on an investigation into the source of a leak of a Palos Verdes Estates Police
 3 Department undercover operation ("Report"). This Report was produced in
 4 discovery by the City of Palos Verdes Estates (City) and marked as
 5 "CONFIDENTIAL" pursuant to the parties' stipulated protective order. *See*
 6 Franklin Decl. at ¶ 31. Although Plaintiffs dispute the confidential nature of this
 7 document, Plaintiffs nonetheless submit this application to file the Report under seal
 8 in accordance with the Local Rules and the parties' stipulated protective order.

9 Counsel for the City was previously informed of Plaintiffs' intent to seek
 10 leave to file Exhibit 21 under seal.¹ *See* Declaration of Samantha Wolff In Support
 11 of Application for Leave to File Under Seal, filed in support of Plaintiffs'
 12 Application to file Exhibit 21 under seal. Dkt. No. 312 ¶ 2.

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14 DATED: August 1, 2017

HANSON BRIDGETT LLP

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By: /s/ Samantha D. Wolff

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CORY SPENCER, DIANA MILENA

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REED, and COASTAL PROTECTION

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RANGERS, INC.

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¹ Plaintiffs sought leave to file Exhibits 21 and 15 under seal, however, the unredacted/confidential contents Exhibit 15 are not referenced in Plaintiffs' Opposition, Plaintiffs' AMF, or the Franklin Declaration.

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